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T.R.A. DOCKET ROOM  
January 30, 2004

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VIA HAND DELIVERY

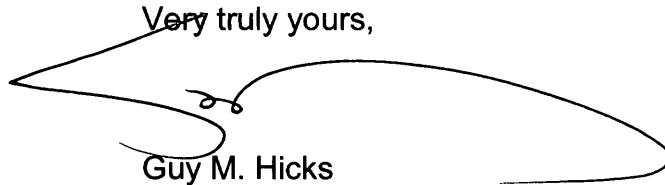
Hon. Deborah Taylor Tate, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's  
Triennial Review Order (Nine-month Proceeding)(Switching)*  
Docket No. 03-00491

Dear Chairman Tate:

Enclosed are the original and fourteen copies of *BellSouth's General and Specific Objections to AT&T's Second Set of Interrogatories*. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**  
**Nashville, Tennessee**

In Re: *Implementation of the Federal Communications Commission's Triennial Review Order (Nine-month Proceeding)(Switching)*

Docket No. 03-00491

**BELLSOUTH TELECOMMUNICATIONS, INC.'S**  
**GENERAL AND SPECIFIC OBJECTIONS TO**  
**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL**  
**STATES, LLC'S SECOND SET OF INTERROGATORIES**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files the following General and Specific Objections to AT&T Communications of the South Central States, LLC's ("AT&T") Second Set of Interrogatories, dated January 20, 2004.

The objections stated herein are preliminary in nature. Should additional grounds for objection be discovered as BellSouth prepares its answers to the above-referenced interrogatories and request for production of documents, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

**GENERAL OBJECTIONS**

1. BellSouth objects to the interrogatories to the extent they seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such interrogatories are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Specifically, AT&T defines BellSouth to include, in relevant part, "parents, subsidiaries, and affiliates ...." BellSouth will not be responding to discovery that seeks information from parent and affiliate companies.

2. BellSouth objects to the interrogatories to the extent they are intended to apply to matters other than those subject to the jurisdiction of the Authority. BellSouth objects to such interrogatories as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every interrogatory and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every interrogatory insofar as the interrogatories are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories. Any answers provided by BellSouth in response to the interrogatories will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action. BellSouth will attempt to note in its responses each instance where this objection applies.

6. BellSouth objects to providing information to the extent that such information is already in the public record before the Authority.

7. BellSouth objects to AT&T's interrogatories, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Tennessee Rules of Civil Procedure or Tennessee Law.

8. BellSouth objects to each and every interrogatory, insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth is a large corporation with employees located in many different locations in Tennessee and in other states. In the course of its business, BellSouth creates

countless documents that are not subject to commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

10. BellSouth objects to each and every interrogatory to the extent that the information requested constitutes “trade secrets”. To the extent that AT&T requests proprietary confidential business information, BellSouth will make such information available in accordance with the parties’ Protective Agreement and the Protective Order to be entered in this proceeding, subject to any other general or specific objections contained herein.

11. BellSouth also objects to any interrogatory to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC’s Customer Proprietary Network Information (“CPNI”) rules, 47 CFR §64.2007 or under protective agreements with CLECs to which BellSouth is a party. BellSouth will only provide CPNI and CLEC confidential information consistent with the FCC’s rules and BellSouth-executed protective agreements.

12. BellSouth objects to any discovery request that seeks to obtain “all” of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

### **SPECIFIC OBJECTIONS TO INTERROGATORIES**

**REQUEST NO. 113:** Please indicate the number of “ported” residential telephone numbers to each CLEC, in each market listed in BellSouth Witness Pamela A. Tipton Direct

Testimony Exhibit PAT-5. Please provide this information, if available, by month and by CLEC over the past 24 months or whatever time period Ms. Tipton relied on for her testimony.

**OBJECTION:** BellSouth objects to Interrogatory 113 to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under protective agreements with CLECs to which BellSouth is a party. BellSouth will only provide CPNI and CLEC confidential information consistent with the FCC's rules and BellSouth-executed protective agreements.

**REQUEST NO. 114:** Please indicate the number of "extracted" business class loops to each CLEC, in each market listed in BellSouth Witness Pamela A. Tipton Direct Testimony Exhibit PAT-5. Please provide this information, if available, by month and by CLEC over the past 24 months or whatever time period Ms. Tipton relied on for her testimony.

**OBJECTION:** BellSouth objects to Interrogatory 114 to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under protective agreements with CLECs to which BellSouth is a party. BellSouth will only provide CPNI and CLEC confidential information consistent with the FCC's rules and BellSouth-executed protective agreements.

**REQUEST NO. 115:** Please provide for the last eighteen months, by month, by market, by wire center within the market, and by CLEC the number of:

- a. 2-Wire UNE loops;
- b. 4- Wire UNE loops;
- c. DS1 UNE loops;
- d. DS3 UNE loops;
- e. DS0 EELs;
- f. DS1 EELs;
- g. DS3 EELs;

- h. T-1 Special Access lines; and
- i. DS3/T-3 Special Access lines

provisioned to the CLECs listed in BellSouth Witness Pamela A. Tipton Direct Testimony Exhibit PAT-5.

**OBJECTION:** BellSouth objects to Interrogatory 115 to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under protective agreements with CLECs to which BellSouth is a party. BellSouth will only provide CPNI and CLEC confidential information consistent with the FCC's rules and BellSouth-executed protective agreements.

**REQUEST NO. 116:** Please provide all information "related to the actual deployment that exists in 7 of the 10 markets." Including at a minimum:

- a. The identify each of the switches claimed to be providing service to mass market customers, by owner, location and CLLI code;
- b. The number of mass market customers claimed to be served from each switch;
- c. The number of "ported" residential telephone numbers to each CLEC, in each market listed. Please provide this information, if available, by month, and by CLEC over the past 24 months.
- d. The number of "extracted" business class loop to each CLEC, in each market listed. Please provide this information, if available, by month and by CLEC over the past 24 months.
- e. For the last eighteen months, by month, by market, by wire center within the market, and by CLEC the number of:
  - i. 2W UNE loops;
  - ii. 4W UNE loops;

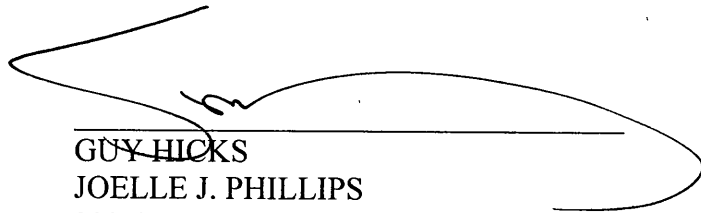
- iii. DS1 UNE loops;
- iv. DS3 UNE loops;
- v. DS0 EELs;
- vi. DS1 EELs;
- vii. DS3 EELs;
- viii. T-1 Special Access lines;
- ix. DS3/T-3 Special Access lines;

provisioned to the CLECs listed in BellSouth Witness Pamela A. Tipton Direct  
Testimony Exhibit PAT-7.

**OBJECTION:** BellSouth objects to Interrogatory 116 to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under protective agreements with CLECs to which BellSouth is a party. BellSouth will only provide CPNI and CLEC confidential information consistent with the FCC's rules and BellSouth-executed protective agreements.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



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## CERTIFICATE OF SERVICE

I hereby certify that on January 30, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated:

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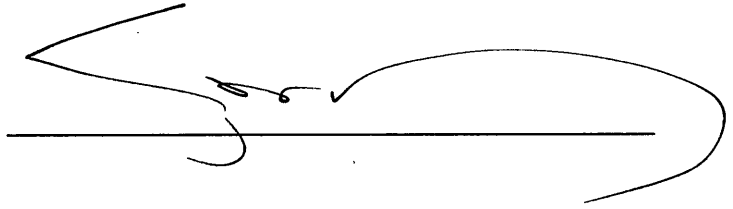
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A handwritten signature in black ink, appearing to read "Ken Woods", is written over a horizontal line. The signature is stylized with a large, sweeping loop at the end.